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Attorneys for Plaintiff
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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

REARDEN LLC, et al.,
 Plaintiffs,
 v.
 THE WALT DISNEY COMPANY, et al.,
 Defendants,

Case Nos.: 3:17-cv-04006-JST
 3:17-cv-04191-JST

REARDEN LLC, et al.,
 Plaintiffs,
 v.
 TWENTIETH CENTURY FOX FILM
 CORPORATION, et al.,
 Defendants.

**DECLARATION OF MARK CARLSON IN
 SUPPORT OF PLAINTIFFS' RESPONSE
 TO DEFENDANTS OBJECTIONS TO
 INTERROGATORIES**

1 I, MARK CARLSON, declare as follows:

2 1. I am an attorney with Hagens Berman Sobol Shapiro LLP, and I am one of the firm's
3 lawyers representing the plaintiffs in this case. I have personal knowledge of the facts stated in this
4 declaration, and could testify with respect to those facts under oath if called upon to do so.

5 2. Disney Interrogatory No. 5 requests identification of custodians of contracts with
6 various entities that Disney characterizes as "third parties." Attached hereto as Exhibit 1 is a true
7 and correct copy of Exhibit 2 to the Disney deposition, which was Disney's identification of its
8 subsidiaries involved in the production, promotion, distribution and profit sharing for *Beauty and the*
9 *Beast*, *Avengers: Age of Ultron*, and *Guardians of the Galaxy*. I have highlighted the entities
10 involved in the contracts referenced in the deposition transcript, which the document shows are all
11 subsidiaries of The Walt Disney Company.

12 3. Disney Interrogatory No. 5 also requests identification of custodians of contracts with
13 various entities shown on Disney Deposition Exhibit No. 6, a true and correct copy of which is
14 attached hereto as Exhibit 2. Disney characterizes these entities as "third parties," but Exhibit 6 was
15 Disney's identification of persons and entities that were involved in the production, promotion,
16 distribution and profit sharing for the relevant films that may have relevant documents. Exhibit 1,
17 hereto, shows the referenced entities as subsidiaries of Disney.

18 4. Fox Interrogatory No. 1 requests identification of contracts and their custodians with
19 various entities that Fox characterizes as "third parties." Attached hereto as Exhibit 3 is a true and
20 correct copy of Fox Deposition Ex. 12, that shows production companies Fox Louisiana Productions,
21 Fox US Productions 31, Fox US Productions 40, and TCF Vancouver, and Twentieth Century Fox
22 Home Entertainment, as subsidiaries of Twentieth Century Fox Film Corp. Tim Miller directed
23 *Deadpool*, and Miller worked for Blur Studios. Josh Trank and Shawn Levy directed *Night at the*
24 *Museum: Secret of the Tomb* and *Fantastic Four*. Defendants have admitted in declarations that
25 Luma Pictures and The Moving Picture Company worked on visual effects for the relevant
26 characters in the relevant films.

I declare that the foregoing is true and correct under penalty of perjury.

Signed in Seattle, Washington, by:

Mark Carlson